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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Henry Truong, individually and on behalf
of all those similarly situated,

Plaintiff,

V.

LG-Philips LCD Co. Ltd., LG Philips LCD America, Inc.; Samsung Electronics Co. Ltd.; Sharp Corporation; Sharp Electronics Corporation; Toshiba Corporation Toshiba Matsushita Display Technology Co., Ltd.; Hitachi Ltd.; Hitachi Displays, Ltd.; Hitachi America Ltd.; Hitachi Electronic Devices (USA), Inc.; Sanyo Epson Imaging Devices Corporation; NEC Corporation; NEC LCD Technologies, Ltd.; NEC Electronics America, Inc.; IDT International Ltd.; AU Optronics; International Display Technology Co., Ltd.; International Display Technology USA Inc.; AU Optronics Corporation America; Chi Mei Optoelectronics; Chi Mei Optoelectronics USA, Inc.; Chunghwa Picture Tubes Ltd.; Hannstar Display Corporation,

Defendants.

Case No. C-06-7639 MMC

STIPULATION AND ORDER FOR EXTENSION OF TIME

Honorable Maxine M. Chesney

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**MORGAN, LEWIS &
BOCKIUS LLP**
ATTORNEYS AT LAW
SAN FRANCISCO

1-SF/7453503.1

**STIPULATION AND ORDER
FOR EXTENSION OF TIME
C-06-7639 MMC**

STIPULATION FOR EXTENSION OF TIME

WHEREAS plaintiff filed a complaint in the above-captioned case on or about December 12, 2006;

WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid Crystal Display (“LCD”) products;

WHEREAS more than fifteen complaints have been filed to date in federal district courts throughout the United States by plaintiffs purporting to bring class actions on behalf of indirect purchasers alleging antitrust violations by manufacturers of LCD products (collectively, “the LCD Cases”);

WHEREAS there is a motion pending before the Judicial Panel on Multidistrict Litigation to transfer the LCD Cases to the Northern District of California for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

WHEREAS plaintiff anticipates the possibility of Consolidated Amended Complaints in the LCD Cases;

WHEREAS plaintiff and Hitachi America, Ltd. (“HAL”) and Hitachi Electronic Devices (USA), Inc. (“HED-US”) have agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be more efficient for the parties and for the Court;

WHEREAS plaintiff agrees that the deadline for HAL and HED-US to respond to the Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after plaintiff provided written notice to HAL and HED-US that plaintiff does not intend to file a Consolidated Amended Complaint, provided that such notice may be given only after the initial case management conference in the MDL transferee court in this case;

WHEREAS plaintiff further agrees that this extension is available, without further stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of their intention to join this extension;

WHEREAS this Stipulation does not constitute a waiver by HAL and HED-US or any defendant of any defense, including but not limited to the defenses of lack of personal or subject

1 matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper
 2 venue.

3 PLAINTIFF AND DEFENDANTS HAL AND HED-US, BY AND THROUGH THEIR
 4 RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

5 1. The deadline for the HAL and HED-US to respond to the Complaint shall be
 6 extended until the earlier of the following two dates (1) forty-five days after the filing of a
 7 Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff
 8 provides written notice that he does not intend to file a Consolidated Amended Complaint,
 9 provided that such notice may be given only after the initial case management conference in the
 10 MDL transferee court in this case.

11 2. This extension is available, without further stipulation with counsel for plaintiff or
 12 further order of the Court, to all named defendants who notify plaintiff in writing of their
 13 intention to join this extension.

14 IT IS SO STIPULATED.

15 Dated: January 5, 2007

16 Signature: CLZ

17 Michael P. Lehmann
 Thomas P. Dove
 Christopher L. Lebsack
 Jon T. King
 Furth Lehmann & Grant LLP
 225 Bush Street, 15th Floor
 San Francisco, CA 94104-4249

18 Francis O. Scarpulla
 Craig C. Corbitt
 Zelle Hofmann Voelbel Mason & Gette LLP
 44 Montgomery Street, Suite 3400
 San Francisco, CA 94104

19 Counsel for Plaintiff Harry Truong

20 **SO ORDERED:**

21 Dated: January 5, 2007

22 Signature: William J. Taylor

23 Kent M. Roger
 William J. Taylor
 Morgan, Lewis & Bockius LLP
 One Market, Spear Street Tower
 San Francisco, CA 94105-1126

24 Counsel for Defendants
 Hitachi America, Ltd. and Hitachi Electronic
 Devices (USA), Inc.